

# **RADIOLOGIC TECHNOLOGY CERTIFICATION COMMITTEE MEETING**

**FEBRUARY 9, 2005**

## **MEMBERS**

**EDGAR BAILEY, CHP, CHAIRMAN**

**EDWARD BENTLEY, MD**

**JACK L. BOIS, DPM**

**WILLIAM BRAGGINS, CRT, ARRT**

**JOYCE COHEN, CRT, ARRT**

**ROGER ENG, MD**

**MELISSA MARTIN, MS**

**THEODORE MILLER, MD**

**JANIS OWENS, MD**

**CHAD D. WARSHEL, DC**

**BERNIE GOLER, MD**

## **MEMBERS ABSENT**

**MARGARET HSING-SHUNG LEE, MD**

## **MEETING SUMMARY**

### **TOPIC**

The meeting of the Radiologic Technology Certification Committee (RTCC) was called to order by Edgar Bailey, Chairman at 9:15 AM. A quorum of eleven members was present. Dr Margaret Hsing-Shung Lee absence was excused.

### **Department of Health Services Administration**

Richard Rodriguez, Preventive Health Services Assistant Deputy Director welcomed the committee and gave a brief review of the history of the (RTCC). Mr. Rodriguez emphasized the critical role that the RTCC plays resolving certification issues for the Radiologic Health Branch (RHB) of the Department of Health Services (DHS). And stated that DHS will continue to support the functions of the RTCC. Mr. Rodriguez introduced all committee members present and then introduced the next speaker, Dr. Kevin Riley.

Dr. Kevin Riley, Preventive Health Services Deputy Director welcomed the RTCC and stressed the importance they play in DHS regulatory programs. He

also discussed budgetary constraints faced by the Department of Health Services (DHS) and the possibility of fee increases.

Dr Riley encouraged participation by individuals in the audience during the public comment period of the meeting.

## **LEGAL REVIEW**

Next speaker, Attorney Michael Lumbard, Staff Counsel presented a legal review of statutes pertinent to the RTCC. The title of his discussion “Law for the Committee” Health and Safety (H&S) code 114855. Attorney Lumbard began by stating that the Director of DHS shall appoint a certification committee to assist, advise, and make recommendations for the establishment of regulations necessary to insure the proper administration and enforcement of the statutes. H&S code 114870 requires that DHS shall adopt regulations that are recommended by the RTCC. These regulations set minimum standards for training for licentiates of the healing arts and persons who apply X-rays to humans for the purpose of diagnostic radiologic technology, for mammography radiologic technology, and for therapeutic radiologic technology.

H&S 11480 requires that any regulations adopted by DHS pursuant to Section 11470 shall be adopted only after consultation and approval of the committee. Approval of those regulations shall be made with six affirmative votes of those present at an official meeting of the committee.

Next Attorney Lumbard discussed The Bagley – Keene Open Meetings Act, Government code Sections 11120 – 11132. He discussed all pertinent provisions of the act including the definition of a meeting, agenda requirements, regular and special meetings, and access to records were reviewed.

- Committee member Braggins asked how does RHB notify interested parties about planned RTCC meetings? And, who is notified?
- Answer: Chairman Bailey, all persons who have requested meeting dates in the past have been notified. RHB maintains a list of interested persons for advance notification, and anyone who wishes to be added to the list should contact RHB.
- Committee member Dr. Goler asked how many RTCC meetings are scheduled annually?
- Answer: Attorney Lumbard said there is no set number of annual meetings required by the statutes. Meetings are scheduled at the discretion of the committee.

## **UPDATES BY THE CERTIFICATION UNIT STAFF**

**Mr. Eustace Douglas, Certification Unit Supervisor was not available so Donald Bunn, RTCC Coordinator introduced staff members for their presentations.**

- 1. Regina Jones, Associate Health Physicist presented a review of the examination administration for technologist and licentiates by the American Registry of Radiologic Technologist (ARRT) under contract with DHS.**
  - Committee member Martin asked if the ARRT administer the examination for a limited permit in x-ray technology?**
  - Answer: Yes.**
- 2. Judy Six, Associate Health Physicist displayed DHS web page, [www.dhs.ca.gov/rhb](http://www.dhs.ca.gov/rhb) and discussed the features and how to navigate it.**
  - Committee member Dr. Owens asked if there are instructions for how to print a temporary authorization from the web page?**
  - Answer: Yes, but you also must change the print style from portrait to “landscape” to avoid cutting off authorization information.**
- 3. Brian Goode, Associate Health Physicist discussed the limited permit school approval process, also, the criteria for accepting out-of-state or out-of-the-country training by applicants. If the individual is licensed by ARRT they may be granted a permit under reciprocity and do not have to take California’s examination.**
  - Committee member Dr. Owens asked are copies of diplomas accepted or must original documents be provided?**
  - Answer: Yes, copies are accepted.**
- 4. Thomas Pomales, Associate Health Physicist discussed the school approval process and listed approved schools as well as schools who have recently applied for approval. Currently there are 32 diagnostic radiologic technology schools, 6 therapeutic radiologic technology schools and 19 limited permit schools. A list of these schools can be found on the web site.**
  - Committee member Dr. Goler asked what are the scopes of practice that a limited permit holder can obtain?**
  - Answer: Certificates can be obtained in different categories covering most of the body skeleton.**
  - Committee members Martin and Braggins asked if a limited permit holder is permitted to operate fluoroscopic equipment?**
  - Answer: by Brian Goode and Chairman Bailey. No. A permit may be obtained to assist a physician during a fluoroscopic procedure by taking overhead films but they are not allowed to activate the machine in the fluoroscopic mode.**

Next Phillip Scott, Regulation Unit Supervisor, introduced Ms. Lynn Roy, Certified Nuclear Medicine Technologist, who requested to address RTCC about a certification problem faced by operators of Nuclear Medicine Positron Emission Tomography (PET) equipment that also includes the operation of Computerized Tomography (CT) x-ray machines. She stated that recently radiologic technology and nuclear medicine technology operators have begun to perform PET-CT examinations of patients in preparation for oncology treatments.

The problem caused by this dual operation is there are not very many individuals who are certified in Nuclear Medicine who are also certified to operate CT equipment. Phillip Scott said RHB asks the RTCC to review the problem and provide guidance for necessary regulatory changes.

Ms. Lynn Roy, presented information about PET/CT facilities that operate hybrid scanners and how the procedures have become very popular with Oncologist who use the information gained by these scans for more precise location of tumors during treatment planning. Under current regulations the operators of this equipment must be certified in both Radiologic Technology (CRT) and Nuclear Medicine Technology (CNMT). The requirement for dual certification has placed a serious dilemma upon the medical practitioner, because of the shortage of individuals who hold a dual certification necessary to operate the scanners. According to Ms. Roy there are many of the PET-CT units in stand-alone centers and no operators that hold the dual certification necessary to run the equipment as required by law. She urged the RTCC to review the contents of a paper by PET-CT Consensus Conference dated July 31, 2002 and make recommendations to RHB to develop regulations for the creation a dual certification that operators may apply for.

Ms. Roy gave RTCC members a copy of the paper titled Fusion Imaging: A New Type of Technologist For a New Type of Technology.

Statements from the PET-CT Consensus Conference, July 31, 2002, New Orleans, LA.

- Committee member Dr.Goler, asked how many PET-CT centers are there in operation in California? Also, can a Certified Radiologic Technologist (CRT) operate a PET machine?
- Answer: There are approximately 400 PET-CT units in California. No, a CRT cannot operate a PET machine unless they are also a Certified Nuclear Medicine Technologist (CNMT).
- Chairman Bailey stated RHB needs input from RTCC to address this issue and to help develop a regulatory correction.
- Committee member Martin stated the ARRT has developed minimum qualifications and an examination for individuals who want to be certified to operate PET-CT equipment. And she encouraged the RTCC to act promptly on this issue.
- Committee member Dr. Eng. Asked if a (CNMT) can operate CT equipment?
- Answer: Not in the diagnostic mode.

A discussion about the requirements for obtaining a CNMT and CT certificate by committee members followed.

Chairman Bailey asked if a RTCC member wished to make a motion about this issue?

- Committee member Dr. Miller asked for clarification that this item is on the meeting agenda.
- Answer by Chairman Bailey. Yes, the item is considered a certification update.
- A discussion by members followed of how RTCC can review and evaluate this issue.

Ms. Roy pointed out that an evaluation is presented in the paper as well as steps that can be taken by interested operators to obtain a certificate to operate PET-CT units. There is an examination for PET-CT by ARRT that is scheduled for June 2005.

- Motion by Committee member Martin: The RTCC should proceed as fast as possible to make their recommendation to RHB.
- Passed
- Committee members Dr. Eng, Dr. Goler, and Mr. Braggins asked for more details and time to review the paper.
- Chairman Bailey asked for a motion to table the previous motion until after lunch to give members an opportunity to review the paper. He said we will distribute the paper to all members for their review during the lunch period.
- Motion to table previous motion.
- Passed
- Mr. David Little from the audience asked what can be done about the supervision of PET-CT operators? What type of certificate will the physicians need?
- Answer: Chairman Bailey. The physician who supervises will most likely be named on the facilities radioactive material license.

Mr. Phillip Scott continued his presentation of certification regulatory problems RHB is dealing with.

1. How is RHB handling the continuing education requirements for renewal of certificates? Staff are monitoring the requirement by random selection as renewals come in.
  - Committee member Braggins asked do certificate renewal dates coincide with ARRT renewal dates?
  - Answer: No.
  - Question by Committee member Dr. Bentley, can a non-Radiologist apply for CEU credits for attending a conference? What topics should the conference deal with that can be applied as CEU credit?
  - Answer: The physician should apply for the credit and staff will evaluate the content of the conference to see if CEUs would apply.

- Committee member Dr.Cohen asked does obtaining a permit in an additional category qualify a limited permit holder for CEUs?
- Answer by Mr. Pomalles, Certification Unit staff, Yes.
- Committee member Dr.Eng asked if the staff have any information about how difficult it is for non-radiologist physicians to get CEUs?
- Answer: There is a proposal by the California Medical Association (CMA) to place the criteria for CEUs in law rather than regulation. Chairman Bailey asked Mr. Bob Acherman of the California Radiological Society (CRS) to address the proposed changes in the CEU requirements his organization was supporting.
- Mr. Acherman said the present requirements are difficult to meet for non-radiologist physicians and CRS is sponsoring a bill that will define the areas of training CEUs must address.
- Chairman Bailey said the questions a physician should ask about CEU's are: "What was the purpose of CEU? Does the CEU offer training in radiation safety or does it only cover equipment and procedural updates".
- Some members of the audience raised questions regarding the concerns from LPs & CRTs about the CEU requirements. How has the requirement been accepted by individuals who have to meet it to renew their certificates?
- Answer by Regina Jones certification unit staff: We are conducting random audits of renewals for the CEU requirements.
- Answer by Chairman Bailey. The courses must be related to the application of x-ray to the human body. RHB will publish an information notice of what courses are acceptable for CEU credit.
- Committee members Bentley and Warshel said there needs to be better clarification for non-radiologist physicians.
- Chairman Bailey. Agreed.

Next Phillip Scott presented the RTCC sub committee's report of their evaluation of the limited permit program. At the last meeting of RTCC held on November 2000 the following sub-committee recommendations were approved:

1. Discontinue on-the-job training programs.
2. Require re-education of individuals who fail the certification exam three times
3. Discontinue the dermatology x-ray therapy permit category.
4. Form a sub committee to study the training necessary for CT and digital radiography operations.
5. Approved an additional category for a permit in decubitus chest.

6. **Modify the training standard that requires the student take 100 skull examinations on patients before taking the examination for a Skull limited permit. The modification will allow some examinations to be preformed on a phantom.**
7. **Modify the Dental laboratory permit**

**Phillip Scott said the following recommendations were not approved at the November 2000 RTCC meeting and still must have RTCC approval before they can be acted upon:**

1. **No more than 25% of the procedures performed in the upright torso skeletal category shall be counted toward the total number of procedures required.**
2. **Define the scope of practice for limited permits to include the purpose of the examination.**
3. **Amend the GU category to allow taking an abdomen view in the recumbent position also, do not allow studies where contrast media is used, and increase the training hours to 20 hours anatomy and physiology and 10 hours of positioning.**

**Following a lunch break Chairman Bailey called the meeting to order.**

**Committee members asked for clarification of each of the recommendations by Phillip Scott. After discussions Chairman Bailey asked what is the RTCC wishes?**

- **Motion by Committee member Braggins to approve all the subcommittee's recommendations.**
- **Passed.**
- **Committee members raised questions about the GU category that says RHB will develop a position statement.**
- **Answer: Phillip Scott said he would clarify the matter at the next RTCC meeting.**
- **A motion was made to eliminate the recommendation for GU category.**
- **Passed**

**Chairman Bailey said Phillip Scott would present specific regulations for the RTCC approval next meeting.**

**Phillip Scott presented the second subcommittee report on Digital Radiography.**

**The subcommittee recommended that registrants document at least 15 hours of training for CRTs who use digital equipment. The training should be specific for**

electronic imaging. They also recommended that CRTs receive continuing education for digital imaging at least every two years. And facilities must develop Quality Control procedures for digital imaging.

Phillip Scott said that the sub-committee recommended that the requirement that excludes limited permit x-ray technician's authorization to perform digital radiography be maintained.

- Committee member Dr. Bois stated, the automatic exclusion of limited permits prohibits the use of digital equipment, which is being installed in most physician offices.
- Committee members held a long discussion of the question; can limited permit holders use digital x-ray equipment? What is the basis for the decision?
- Committee member Martin said the sub-committee was being overly aggressive and did not emphasize the effect a good quality control program would have on producing high quality radiographs with little exposure to the patient. This decision was made three years ago.
- Committee member Cohen said the committee should re-visit this issue.
- Committee member Miller said he voted for the restriction because of the possibility of patient over exposure when digital equipment is used. However, based on the discussion now the committee was far from unanimous.
- Ten individuals from the audience spoke in support or against the restriction. Most comments were for the improvement of training programs for both CRT's and LP's to add digital radiography to the schools curriculum. Mr. Nardinelli, UC Davis Med. Center said some of the new x-ray equipment does not allow for the measurement of the patient dose from a radiograph. Diane Garcia, City College of San Francisco said that if the technician does not understand technical factors the patient may be over radiated by a factor of ten.
- Committee member Eng asked about the course length for a limited license? Also, how much training is necessary for digital radiography? Committee member Martin said 15 hours but only for CRTs not LPs.
- **Motion: Approve the sub-committee's recommendation to not allow limited premittees to use digital radiography equipment.**
- **Passed six to four.**

Chairman Bailey said this issue would be revisited by the RTCC.

Phillip Scott discussed recent regulatory changes that established a separate category for a Limited Permit to operate bone densitometry equipment.

Also, there may be a need to create a special category of CRT that can operate at a higher level like Physicians assistants do in the Nursing field. The



American Board of Radiography is proposing to grant certification to the Radiographer Practioner Assistant category. For more detail go to ASRT.org on the internet.

Also, the CARE Act (HR 1214) is a federal proposal that has not passed Congress yet. It would amend the Social Security Act to require that every state that participates in Medicaid must have a medical radiation licensure program that includes x-ray, nuclear medicine, and MRI. If this act passes California will be required to have a licensure program for MRI operators.

### **Return to the PET-CT operator question.**

- **Motion by Committee member Martin to allow individuals who have passed the June 2005 ARRT examination for PET-CT are granted a certificate to operate the equipment.**
- **Passed.**

### **Chairman Bailey opened the floor to Public Comments**

(1) John Hultman, Calif. Podiatric Med.Assn. Requested the committee reconsider the digital issue for LP's

(2) Diane Garcia, President RT Educators of Calif. The California Society of Radiologic Technologist (CSRT) is concerned about the appointment of members to RTCC by DHS. Although the committee appointments do meet the letter of the law CSRT request the RTCC agendize their concerns for open discussion during the next RTCC meeting.

(3) Angela Wilson, Program Director, Yuba College. The RTCC needs to re-evaluate all Radiologic Technology schools curriculum.

(4) Robert Salzman, Vice President, Reina Digital Imaging of Chicago. The RTCC should consult with technical representatives from industry concerning the digital radiography issue and training requirements.

(5) Richard Nardinelli, UC Davis, Sacramento Med. Center. The RTCC should not reduce the continuing education requirements. Doctors and Technologist should have no trouble meeting the minimum number of hours now in place.

(6) Ann Smeltzer, Program Director Cabrillo College. There should be approved curriculum for digital radiography not just another examination. The curriculum should be incorporated into current programs and should be performance based. That is the trend of the ASRT and ARRT in their training programs.

(7) Kyle Thornton, Program Director San Francisco City College. The RTCC should reconsider its definition of the term Continuous Education Units (CEU) and adopt the ASRT category A units as a replacement.

(8) Nancy Perkins, Bakersfield College; Request that the RTCC Bring the curriculum for CRT & LP courses up to date to incorporate new technologies like digital imaging.

(9) Ms. Ortega, There should be levels of Radiologic Technologist similar to Nurses that would allow for the creation of Radiologist Assistants. Also, the field of education of RTs and LPs would welcome an evaluation of curriculum of training programs to bring them up to date. She would like the RTCC to establish a subcommittee to evaluate programs and make recommendations for changes needed on a fast tract.

(10) Adam Ulias, Merritt College, There should be an effort to bridge the gap between RT & XT professions to create a more uniform approach to the training and working conditions of both groups.

Chairman Bailey thanked all members of the audience for their comments. Also, an attendance sign in sheet was placed at the room entrance for attendees to list their address for receipt of RTCC meeting minutes and future information

## **NEXT MEETING DATE AND LOCATION**

Chairman Bailey asked preferences for the next RTCC meeting date. Committee members selected September 21, 2005 at a location yet to be determined.

Committee member Braggins, Motion to adjourn the meeting.  
Passed.

Chairman Bailey, Thanked all committee members and those in attendance and declared the meeting adjourned at 3:15PM

Submitted by Donald E. Bunn,  
RTCC Coordinator  
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